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Americans with Disabilities Advocates,  
JOSEPH S. TACL and GEORGE S. LOUIE

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

AMERICANS WITH DISABILITIES

ADVOCATES, a Nevada Nonprofit

Corporation, JOSEPH S. TACL and GEORGE

S. LOUIE

Plaintiffs,

vs.

DAYS INN, AND BHULA DHANFUKHLAL

AND RAJA PATEL, 950 NORTH STREET,

UKIAH, CA

Defendants.

Case No.

03 0737

CIVIL RIGHTS

COMPLAINT FOR VIOLATION OF CIVIL  
RIGHTS AND DISCRIMINATION  
AGAINST PERSONS WITH  
DISABILITIES; AMERICANS WITH  
DISABILITIES ACT OF 1990; CAL. CIVIL  
CODE §§54, ET SEQ.; CAL. CIVIL CODE  
§§51, ET SEQ.; CAL. CIVIL CODE  
§§345; CAL. HEALTH & SAFETY CODE  
§§19955, ET SEQ.; CAL. BUS. & PROF.  
CODE §17200, ET SEQ.; NEGLIGENCE;  
DECLARATORY RELIEF; DAMAGES  
FOR PERSONAL INJURY

DEMAND FOR JURY TRIAL

INTRODUCTION

1. Plaintiffs complain of Defendants herein and allege that:

AMERICANS WITH DISABILITIES ADVOCATES is a Nevada Nonprofit Corporation  
organized with the principal purpose of helping to eliminate discrimination against individuals  
with disabilities by ensuring public facilities are in compliance with laws intended to provide  
access to housing, public buildings, transportation, goods and services and to make sure that  
people with disabilities are treated with dignity.

1 In addition, AMERICANS WITH DISABILITIES ADVOCATES ensures that disabled  
2 persons are offered the same opportunities extended to people without disabilities and helps to  
3 educate persons with disabilities about the laws related to them.

4 Members of AMERICANS WITH DISABILITIES ADVOCATES are primarily  
5 individuals with disabilities and persons related to individuals with disabilities. Membership  
6 includes residents throughout the United States.

7 As a result of their disabilities, certain accommodations are necessary to allow  
8 AMERICANS WITH DISABILITIES ADVOCATES members access to public buildings,  
9 transportation, goods and services.

10 AMERICANS WITH DISABILITIES ADVOCATES is committed to serving the needs  
11 of all disabled people and fully supports the Americans With Disabilities Act of 1990, California  
12 Disabled Persons Act and Unruh Civil Rights Act.

13 AMERICANS WITH DISABILITIES ADVOCATES believes the goals and objectives  
14 of these laws will enhance the quality of our society, that the American economy will be made  
15 stronger by businesses that reach out to include all segments of the population, and that these  
16 laws ultimately help to invigorate the economy by bringing more individuals with disabilities  
17 into the consumer mainstream. It is also AMERICANS WITH DISABILITIES ADVOCATES'  
18 belief that meaningful efforts to do so will offer many citizens more opportunities to participate  
19 fully in the economic and social mainstream. There can be no question that the Americans With  
20 Disabilities Act, passed in 1990, established as law the nation's interest in eradicating the bigotry  
21 and barriers faced by individuals with disabilities 42 U.S.C. §12101 et seq (hereafter "ADA").  
22 In fact, the ADA states its first goal as being "to provide a clear and comprehensive national  
23 mandate for the elimination of discrimination against individuals with disabilities." See, 42  
24 U.S.C. §12101 (b) (1) (1999). The ADA creates the possibility that successful Plaintiffs may  
25 establish permanent changes in the design and physical configuration of structures to better  
26 accommodate the disabled 42 U.S.C. §12101 (A) (5). The benefits of each change clearly  
27 rebound not only to Plaintiffs themselves, but also to similarly situated disabled persons, and the  
28 entire society at large. Plaintiffs or Plaintiffs' classes who bring suit pursuant to the ADA do so

1 in the role of "private attorneys general" who seek to vindicate "a policy of the highest priority"  
 2 See, *Christiansburg Garment Co v EEOC*, 434 U.S. 412, 417, 98 S.Ct. 694, 698 (discussing  
 3 ADA Plaintiffs as private attorneys general); *Rosenberg v Merrill Lynch, Pierce, Fenner & Smith,*  
 4 *Inc.*, 170 F.3d 1, 11 (1<sup>st</sup> Cir, 1999).

5 DAYS INN AND BHULA DHANFUKHLAL AND RAJA PATEL provides inadequate access  
 6 to people with disabilities, including, *inter alia*:. This Inn does not provide the correct  
 7 enforcement signs required by ADAAG section 4.6.4(2) and Title 24 1129B.5. There are no  
 8 accessible signs on any doors or walls to identify an accessible room a violation of ADAAG  
 9 section 4.30.6 and 4.30.7. There is no accessible route signs to any rooms a violation of ADAAG  
 10 section 4.1.2(7) (c) and Title 24 1117B.5.7. The one accessible parking space is not on the  
 11 shortest accessible route to the office a violation of ADAAG section 4.6.2 and Title 24 1129B.1  
 12 The route to the office is not level and clear, it exceeds 2% incline and requires a wheelchair  
 13 rider to maneuver around posts. This accessible route is not 44 inches wide both violations of  
 14 ADAAG section 4.3.7 and 4.4.1 and Title 24 1133B.6.2. There is no access aisle provided for  
 15 the accessible parking space a violation of ADAAG section 4.6.3. No Van Accessible Parking is  
 16 provided for a violation of ADAAG section 4.1.2.5(b) and Title 24 1129B.5. There is no counter  
 17 in the office 36 inches high to provide for a wheelchair rider a violation of ADAAG section 7.2.2  
 18 There is a swimming pool provided for the guests but it has stairs going to it, this makes it  
 19 inaccessible to a wheelchair rider a violation of ADAAG section 4.1.2(2). See Exhibits A and B,  
 20 Inaccessible path of travel to entranceway due to the lack of handicapped access into rental  
 21 office/entranceway; See Exhibit C, D and E, Improper handicapped parking, including the  
 22 insufficient width of the access aisle, no handicapped signage and proper striping. Because of  
 23 these barriers, entering this facility was impossible for persons with mobility disabilities, such as  
 24 the Plaintiffs, to gain access to this facility.

### 25 26 JURISDICTION

27 This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. sections  
 28 1343(a)(3) and 1343(a)(4) for claims arising under the Americans With Disabilities Act of 1990,

42 U.S.C. sections 12101, et. seq. Plaintiffs' cause of action arose in this district. DAYS INN AND BHULA DHANFUKHLAL AND RAJA PATEL are residents of UKIAH, California.

Under the doctrine of pendant and supplemental jurisdiction, this Court has jurisdiction over Plaintiffs' claims arising under California State law.

### VENUE

3. Pursuant to 28 U.S.C. section 1391(b), venue is proper in the District in which this complaint is filed, which is the judicial district in which the claims have arisen. DAYS INN AND BHULA DHANFUKHLAL AND RAJA PATEL is a California corporation and/or business.

### PARTIES

4. Plaintiff GEORGE S. LOUIE is an individual with a physical disability within the meaning of all applicable statutes, including the ADA, 42 United States Code section 12101, et seq., California Civil Code sections 54 et. seq., California Business and Professions Code sections 17200, et seq., and California Health and Safety Code sections 19955, et seq. Plaintiff GEORGE LOUIE is a physically disabled or "physically handicapped" person who often requires use of a wheelchair to travel about in public places. Mr. LOUIE is a diabetic whose physical conditions required the amputation of his right leg in 1996. Although he sometimes can walk with the aid of a prosthesis, at other times difficulties with sores on the stump of his amputated leg, make use of the prosthesis difficult or impossible and requires that he use a wheelchair in order to travel about in public. Plaintiff JOSEPH S. TACL is an individual with a physical disability within the meaning of all applicable statutes, including the ADA, 42 United States Code section 12101, et seq., California Civil Code sections 54 et. seq., California Business and Professions Code sections 17200, et seq., and California Health and Safety Code sections 19955, et seq. Plaintiff JOSEPH S. TACL is a physically disabled or "physically handicapped" person who often requires use of a wheelchair to travel about in public places. Mr. TACL was a pedestrian and hit by a van on September 7, 1993. As the result of this accident, his lower back

1 was shattered and 32 inches of titanium was placed in his back, leaving him in constant pain and  
2 unable to use his legs on a regular basis. Although he sometimes can walk with the aid of a cane,  
3 at other times the difficulty with his back injuries makes use of the cane difficult or impossible  
4 and requires that he use a wheelchair in order to travel about in public.

5 5. Defendants DAYS INN AND BHULA DHANFUKHLAL AND RAJA PATEL, are  
6 located in UKIAH, CA, is a for-profit partnership that owns, operates, maintains and/or controls  
7 retail establishments located in the City of UKIAH, County of MENDOCINO, State of  
8 California.

9 6. Plaintiffs are informed and believe, and therefore allege, that DAYS INN AND  
10 BHULA DHANFUKHLAL AND RAJA PATEL business was newly built and/or underwent  
11 substantial remodeling, repairs or alterations after 1971.

12 7. Defendants have known that DAYS INN AND BHULA DHANFUKHLAL AND  
13 RAJA PATEL violated disability access requirements and standards, but have refused to rectify  
14 the violations.

15  
16 **FACTUAL ALLEGATIONS**  
17

18 8. GEORGE S. LOUIE is the Executive Director of the AMERICANS WITH  
19 DISABILITIES ADVOCATES and is a physically disabled person who uses a wheelchair for  
20 mobility. JOSEPH S. TACL is a Member of the AMERICANS WITH DISABILITIES  
21 ADVOCATES and is a physically disabled person who often uses a wheelchair for mobility.

22 9. Within 8 months before the filing of this complaint, Plaintiffs JOSEPH S. TACL and  
23 GEORGE S. LOUIE attempt to visit DAYS INN for the purpose of renting two separate  
24 handicapped rooms.

25 10. Plaintiffs will visit this facility on a regular basis when it comes into compliance with  
26 state and federal law.

27 11. Defendants own, operate and/or maintain a public accommodation as DAYS INN  
28 AND BHULA DHANFUKHLAL AND RAJA PATEL located in the City of UKIAH, County of

1 MENDOCINO, and State of California. This case arises out of Defendants' failure to provide  
 2 the minimum legally required access to its public accommodations for persons with disabilities.

3 12. DAYS INN AND BHULA DHANFUKHLAL AND RAJA PATEL have the  
 4 following violations:

- 5 a. This Inn does not provide the correct enforcement signs required by ADAAG  
 6 section 4.6.4(2) and Title 24 1129B.5.
- 7 b. There are no accessible signs on any doors or walls to identify an accessible  
 8 room a violation of ADAAG section 4.30.6 and 4.30.7.
- 9 c. There is no accessible route signs to any rooms a violation of ADAAG section  
 10 4.1.2(7) (c) and Title 24 1117B.5.7.
- 11 d. The one accessible parking space is not on the shortest accessible route to the  
 12 office a violation of ADAAG section 4.6.2 and Title 24 1129B.1
- 13 e. The route to the office is not level and clear, it exceeds 2% incline and  
 14 requires a wheelchair rider to maneuver around posts. This accessible route is  
 15 not 44 inches wide both violations of ADAAG section 4.3.7 and 4.4.1 and  
 16 Title 24 1133B.6.2.
- 17 f. There is no access aisle provided for the accessible parking space a violation  
 18 of ADAAG section 4.6.3.
- 19 g. No Van Accessible Parking is provided for a violation of ADAAG section  
 20 4.1.2.5(b) and Title 24 1129B.5.
- 21 h. There is no counter in the office 36 inches high to provide for a wheelchair  
 22 rider a violation of ADAAG section 7.2.2
- 23 i. There is a swimming pool provided for the guests but it has stairs going to it,  
 24 this makes it inaccessible to a wheelchair rider a violation of ADAAG section  
 25 4.1.2(2)

26  
 27 13. The inaccessibility of DAYS INN AND BHULA DHANFUKHLAL AND RAJA  
 28 PATEL to persons with disabilities is illegal, degrading and humiliating.



1 14. Many of the actions which Defendants failed to make DAYS INN AND BHULA  
 2 DHANFUKHLAL AND RAJA PATEL accessible to persons with disabilities were readily  
 3 achievable, required by law and would have greatly assisted persons with disabilities at little  
 4 expense to Defendants.

5 15. Because of these barriers, entering this facility was impossible for persons with  
 6 mobility disabilities, such as the Plaintiffs, to gain access to this facility.

7 16. California's Unruh Civil Rights Act, Civil Code Section 52(a) reads as follows:  
 8 Whoever denies, aids or incites a denial, or makes any discrimination or distinction contrary to  
 9 Section 51, 51.5 or 51.6, is liable for each and every offense for the actual damages, and any  
 10 amount that may be determined by a jury, or a court sitting without jury, up to a maximum of  
 11 three times the amount of actual damage but in no case less than four thousand dollars  
 12 (\$4,000.00), and any attorney's fees that may be determined by the court in addition thereto,  
 13 suffered by any person denied the rights provided in Section 51, 51.5, or 51.6. Amended January  
 14 1<sup>st</sup>, 2002.

15 17. The Attorney General of the State of California believes that the former \$1,000.00  
 16 damage award is unlikely to have sufficient deterrent effect on the discriminatory practices of a  
 17 large company. Defendants may have had hundreds or thousands of transactions that violated  
 18 the Americans with Disabilities Act of 1990 and the California's Unruh Civil Rights Act and  
 19 which would have unjustly enriched them. Thus, the prospect of paying an occasional four  
 20 thousand dollars (\$4,000.00) damage award due to a discriminatory practice may be calculated  
 21 as an absorbable cost of doing business. The minimum amount was increased to at least  
 22 \$4,000.00. See California's Unruh Civil Rights Act Section 52(a), Amended January 1<sup>st</sup>, 2002.  
 23 This legislation was supported by California Attorney General, Anti-Defamation League and  
 24 California School Employees Association.

25 18. The United States Court of Appeals for the Ninth Circuit in Botosan vs. Paul  
 26 McNally Realty, 216 F.3<sup>rd</sup> 827 at 835 (June 20, 2000) held that, "Consumer was entitled to  
 27 award of statutory minimum damages under California's Unruh Civil Rights Act, even without  
 28 prove of actual damages", and "Proof of actual damages is not prerequisite to recovery of

1 statutory minimum damages under California's Unruh Civil Rights Act." West's  
 2 Ann.Cal.Civ.Code §52.

### 3 4 FIRST CLAIM

5 (Violation of the Americans With Disabilities Act)

6 19. Plaintiffs incorporate by reference herein the allegations in paragraphs 1-18,  
 7 inclusive.

8 20. Defendants' acts and omissions alleged herein are in violations of the ADA, 42  
 9 U.S.C. sections 12101, et. seq., and the regulations promulgated thereunder, 28 Code of Federal  
 10 Regulations Part 36.

11 21. DAYS INN AND BHULA DHANFUKHLAL AND RAJA PATEL is a public  
 12 accommodation covered by Title III of the ADA.

13 22. Defendants have failed to remove barriers to be accessed by persons with disabilities  
 14 at DAYS INN AND BHULA DHANFUKHLAL AND RAJA PATEL where removal of such  
 15 barriers is readily achievable.

16 23. Defendants have failed to provide necessary auxiliary aids and services at DAYS INN  
 17 AND BHULA DHANFUKHLAL AND RAJA PATEL where provision of such auxiliary aids  
 18 and services does not pose an undue burden.

19 24. Defendants have failed to modify policies and procedures at DAYS INN AND  
 20 BHULA DHANFUKHLAL AND RAJA PATEL to ensure equal access for persons with  
 21 disabilities.

22 25. Defendants' conduct constitutes ongoing and continuous violations of the ADA and,  
 23 unless restrained from doing so, Defendants will continue to violate said law. Said conduct,  
 24 unless enjoined, will continue to inflict injuries for which Plaintiffs have no adequate remedy at  
 25 law. Consequently, Plaintiffs are entitled to injunctive relief pursuant to section 308 of the ADA  
 26 (42 U.S.C. §12188). Plaintiffs are also entitled to recover reasonable attorneys' fees and costs.

27 WHEREFORE, Plaintiffs request relief as set forth below.  
 28



**SECOND CLAIM**

(Violation of Cal. Civ. Code §§54, et. seq.)

26. Plaintiffs incorporate by reference herein the allegations in paragraphs 1-27, inclusive.

27. The SUBJECT FACILITY constitutes a public accommodation within the meaning of California Civil Code sections 54.1 and 54.3.

28. Defendants have violated Plaintiffs' rights by denying them full and equal access to and use and enjoyment of DAYS INN AND BHULA DHANFUKHLAL AND RAJA PATEL and in doing so, Defendants have acted willfully and maliciously.

29. Defendants' actions constitute a violation of Plaintiffs' rights under California Civil Code sections 54, et. seq., and therefore, Plaintiffs are entitled to injunctive relief remedying the violations. Plaintiffs are also entitled to damages under California Civil Code section 52(a).

30. Plaintiffs are also entitled to reasonable attorneys' fees and costs.

WHEREFORE, Plaintiffs request relief as set forth below.

**THIRD CLAIM**

(Violation of Cal. Civ. Code §§51, and §§52(a) et. seq.)

31. Plaintiffs incorporate by reference herein the allegations in paragraphs 1-32, inclusive.

32. The conduct of Defendants is in violation of California Civil Code sections 51, et. seq., the Unruh Civil Rights Act, in that patrons of the SUBJECT FACILITY who have physical disabilities have either not been provided services and facilities that are provided to other persons or have been provided services and facilities that are not equal to, and are inferior to, the services provided to persons who do not have disabilities.

33. Defendants have committed additional violations of the Unruh Civil Rights Act, in that the conduct alleged herein constitutes a violation of various provisions of the ADA, 42 U.S.C. sections 12101, et. seq., as set forth below.

1 34. The conduct of the Defendants was and is in violation of the Unruh Civil Rights Act,  
2 California Civil Code sections 51, et. seq., and therefore Plaintiffs are entitled to injunctive relief  
3 remedying the violations. Plaintiffs are also entitled under California Civil Code section 52 to  
4 damages.

5 35. Plaintiffs are also entitled to reasonable attorneys' fees and costs.

6 WHEREFORE, Plaintiffs request relief as set forth below.

7  
8 **FOURTH CLAIM**

9 (Violation of Cal. Health &  
10 Safety Code §§19955, et. seq.)

11 36. Plaintiffs incorporate by reference herein the allegations in paragraphs 1-37, inclusive.

12 37. The SUBJECT FACILITY is a public accommodation within the meaning of  
13 California Health and Safety Code section 19955 and Defendants have constructed and/or altered  
14 the SUBJECT FACILITY within the meaning of California Health and Safety Code section  
15 19959. The actions of Defendants constitute a denial of access to and use of the SUBJECT  
16 FACILITY by persons with physical disabilities.

17 38. Defendants' failure to fulfill its duty to provide access have caused Plaintiffs to suffer  
18 injury.

19 39. As a result of Defendants' violation of Health and Safety Code sections 19955, et.  
20 seq., described herein, Plaintiffs are entitled to injunctive relief pursuant to Health and Safety  
21 Code section 19953.

22 WHEREFORE, Plaintiffs request relief as set forth below.

23  
24 **FIFTH CLAIM**

25 (Unfair Business Practice – Injunctive Relief Only;  
26 Cal. Bus. & Prof. Code §§17200, et. seq.)

42. Defendants' policies and practices constitute an unfair business practice within the meaning of California business and Professions Code sections 17200, et. seq., in that inter alia, Defendants appeal to, advertise to, and purport to serve persons with disabilities, yet Defendants' facility is inaccessible and illegal, in violation of public policy.

13 44. Plaintiffs are also entitled to attorney's fees and costs.

14 WHEREFORE, Plaintiffs request relief as set forth below.

45. Plaintiffs incorporate by reference herein the allegations in paragraphs 1-46,  
inclusive.

21 47. Defendants failed, and continue to fail, to exercise ordinary care.

49. At all times relevant hereto, there was in effect, the Americans With Disabilities Act, California Civil Code sections 51, et. seq., California Civil Code sections 54, et. seq., and California Health and Safety Code sections 19955, et. seq., all of which have required that public accommodations and facilities provide services to people with disabilities which are

1 equal to, and are not inferior to, the services provided to patrons who are not physically  
2 disabled.

3 50. Defendants' acts and omissions alleged herein are in violation of statutory  
4 requirements (including, but not limited to, the Americans With Disabilities Act, California  
5 Health and Safety Code sections 51, et. seq., California Business and Professions Code section  
6 17200, et. seq., and public policy, which statutes are designed to protect persons with disabilities  
7 from the type of harm inflicted on Plaintiffs.

8 51. Defendants' conduct thus constitutes negligence and negligence per se.

9 WHEREFORE, Plaintiffs request relief as set forth below.

10 **SEVENTH CLAIM**

11 (Declaratory Relief)

12  
13 52. Plaintiffs incorporated by reference herein the allegations in paragraph 1-53,  
14 inclusive.

15 53. Plaintiffs contend, and are informed and believe that Defendants deny that the  
16 SUBJECT FACILITY fails to comply with applicable laws prohibiting discrimination against  
17 persons with disabilities and are in violation of statutes including, but not limited to, California  
18 Civil Code sections 54, et. seq., California Civil Code sections 51, et. seq., the ADA, Business  
19 and Professions Code section 17200, et. seq., and California Health and Safety Code sections  
20 19955, et. seq.

21 54. A judicial declaration is necessary and appropriate at this time in order that each of  
22 the parties may know their respective rights and duties and act accordingly.

23 WHEREFORE, Plaintiffs request relief as set forth below.

24 **EIGHTH CLAIM**

25 **(VIOLATION OF CALIFORNIA CIVIL CODE, SECTION §3345, UNFAIR OR**  
26 **DECEPTIVE PRACTICES AGAINST SENIOR CITIZENS OR DISABLED PERSONS,**  
27 **TREBLE DAMAGES)**

28 55. Plaintiffs incorporate by reference paragraphs 1-56 above.

56. This section shall apply only in actions brought by, on behalf of, or for the benefit of senior citizens or disabled persons as those terms are defined in subdivisions (f) and (g) of Section 1761, to redress unfair or deceptive acts or practices or unfair methods of competition.

57. Whenever a trier of fact is authorized by a statute to impose either a fine, or a civil penalty or other penalty, or any other remedy the purpose of effect of which is to punish or deter, and the amount of the fine, penalty, or other remedy is subject to the trier of fact's discretion, the trier of fact shall consider all of the following factors, in addition to other appropriate factors, in determining the amount of fine, civil penalty or other penalty, or other remedy in an amount up to three times greater than authorized by the statute, or, where the statute does not authorize a specific amount, up to three times greater than the amount the trier of fact would impose in the absence of that affirmative finding:

58. The defendant knew or should have known that his or her conduct was directed to one or more senior citizens or disabled persons.

### **RELIEF REQUESTED**

WHEREFORE, Plaintiffs pray for judgment as follows:

1. An order and judgment enjoining Defendants from violating the ADA, 42 United States Code sections 12101, et. seq., California Civil Code sections 51, et. seq., California Health and Safety Code sections 19955, et. seq., and California Business and Professions Code sections 17200, et. seq.;

2. A declaration that the SUBJECT FACILITY is designed and operated in a manner which discriminates against persons with physical disabilities and which fails to provide full access for persons with disabilities as required by law;

3. Damages in an amount to be determined by proof;


4. Treble damages pursuant to California Civil Code sections 52(a) and 54.3 and/or punitive damages; and section 1021.5 Code of Civil Procedure;

5. Treble damages pursuant to California Civil Code section 3345;

6. Pre-judgement interest pursuant to section 3291 of the Civil Code;

7. General and compensatory damages according to proof;
8. All damages as afforded by Civil Code section 54.3 for which the Defendants have denied to Plaintiffs equal access for the disabled;
9. Plaintiffs' reasonable attorney's fees and costs;
10. Such other and further relief as the Court deems just and proper.

DATED: February 17, 2003

  
Kim F. Mallory, Esq.  
Attorney for Plaintiffs  
Americans With Disabilities  
Advocates, JOSEPH S. TACL and  
GEORGE S. LOUIE

**DEMAND FOR JURY TRIAL**

PLAINTIFFS hereby demands a jury for all claims for which a jury is permitted.

Dated: February 17, 2003

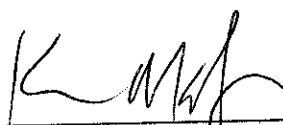
  
Kim F. Mallory, Esq.  
Attorney for Plaintiffs  
Americans With Disabilities  
Advocates, JOSEPH S. TACL and  
GEORGE S. LOUIE





EXHIBIT A

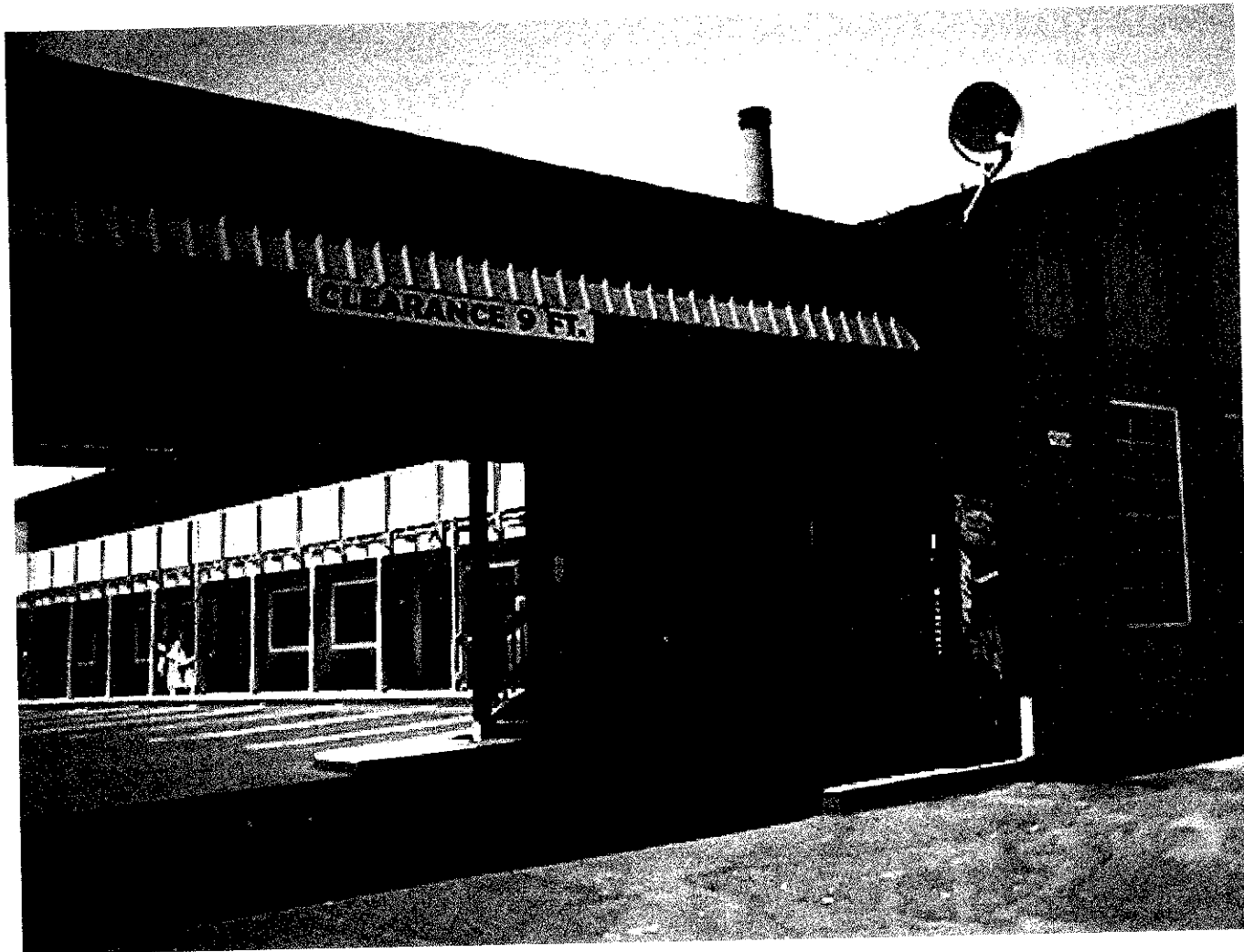


EXHIBIT B

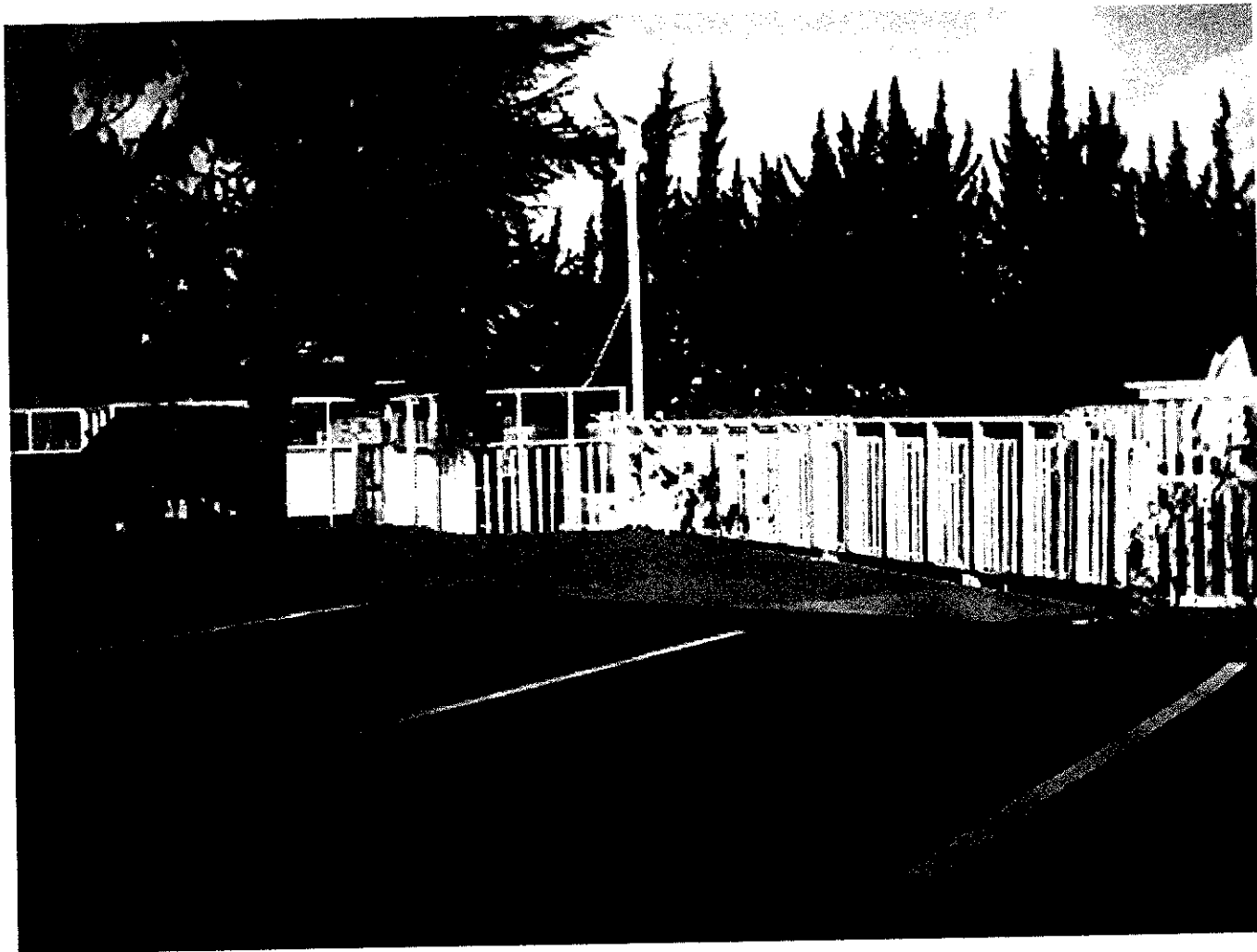


EXHIBIT C



EXHIBIT D



EXHIBIT E



EXHIBIT F